

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

---

CONSUMER FINANCIAL  
PROTECTION BUREAU, et al.,

Case No. 1:24-cv-00040-EAW-MJR

Plaintiff,

vs.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

---

**NOTICE OF THIRD-PARTY MOTION TO INTERVENE FOR PURPOSES OF FILING  
AN OBJECTION TO RECEIVER’S REPORT AND A MOTION TO APPOINT  
SPECIAL RECEIVER AND FOR OTHER PURPOSES**

**ORAL ARGUMENT REQUESTED  
NOTICE OF INTENT TO FILE REPLY**

|                    |   |
|--------------------|---|
| Moving Parties:    | Ice Legal, P.A., Thomas Ice and Ariane Ice<br>("Ice Legal")   |
| Date and Time      | To be determined by the Court.  |
| Place:             | Robert H. Jackson United States Courthouse<br>2 Niagara Square, Buffalo, New York 14202   |
| Supporting Papers: | Memorandum in Support of Third-Party<br>Motion to Intervene for Purposes of Filing an<br>Objection to Receiver’s Report and a Motion<br>to Appoint Special Receiver and for Other<br>Purposes |
| Answering Papers:  | To be filed on a schedule determined by the<br>Court. The moving parties intend to file a<br>reply.   |

Relief Requested:

An order granting Ice Legal the right to intervene in this matter under Rule 24(a)(2), or alternatively by permission under Rule 24(b)(2)

Grounds For Relief:

Rules 24(a)(2) and (b)(2) Fed. R. Civ. P.

Oral Argument:

The Proposed Intervenor request oral argument.

Dated: May 7, 2025

**Lundergan Legal, LLC**

/s/ Amanda L. Lundergan

Amanda L. Lundergan, Esq.  
Post Office Box 211474  
Royal Palm Beach, FL 33421  
Direct: (561) 779-4126  
Assistant: (561) 629-2643  
Email: amanda@lunderganlegal.com

*Attorneys for Proposed Intervenor,  
Ice Legal, P.A., Thomas Ice and  
Ariane Ice*